



STATE OF IOWA

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DEPARTMENT OF EDUCATION
JUDY A. JEFFREY, DIRECTOR

February 19, 2010

Secretary Arne Duncan
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

REQUEST FOR WAIVER

Dear Secretary Duncan:

The Iowa Department of Education (IDE) is fully committed to rigorous interventions in persistently lowest achieving schools, as well as to taking significant actions to address the need for strong school leadership to turn around these schools. This agency has long recognized the role of leadership in student achievement.

We do, however, want to draw your attention to the particularly strict methodology of "fire and replace the principal" as a means to achieving turnaround in every case. The IDE proposes an alternative approach that, in our State's highly rural context, could be as effective as the release of the principal.

Accordingly, the IDE respectfully requests a waiver from the United States Department of Education (USED) regarding the requirement in both the turnaround and transformation models for schools identified as persistently lowest-achieving that the school release its principal.

This is not a request for a waiver from such requirement in all cases. Rather, IDE requests flexibility from USED to allow a persistently lowest-achieving school to retain its principal only when the school provides sufficient documentation of the efforts of its principal to improve school achievement and provides evidence of the steps that the school is implementing to increase the learning of its students. We believe that Appendix A – a template of the proofs we will demand before any exception is granted to an LEA by this agency – demonstrates that we have set a high bar for the schools to meet. Appendix A also demonstrates how this waiver will actually strengthen instruction and result in higher academic achievement for students.

The IDE fully embraces USED's vision that, among other factors, quality educational leadership can and should greatly impact student achievement. To that end, several years ago we embarked on an initiative in Iowa to improve the quality of educational leadership. Those efforts, documented in Appendix B, shall continue as the evidence of the value of instructional leaders continues to emerge.

We believe that, as outlined above, the IDE can manage this flexibility, if granted by you, in such a way that the waiver should not result in the deduction of any points from Iowa's RTTT application.

Prior to submitting this waiver request, the IDE provided those LEAs with a persistently lowest achieving school, as well as the School Administrators of Iowa, the Iowa State Education Association, the Iowa Association of School Boards, and the Iowa Urban Education Network, with direct notice and a reasonable opportunity to comment on this request. Such notice was provided by electronic mail to the LEAs and aforementioned education stakeholders on February 19 with a draft copy of this letter and its appendices. Copies of all comments that the IDE received in response to this notice are attached hereto. We also provided ALL LEAs and the general public with notice and information regarding this waiver request in the manner in which the IDE customarily provides such notice and information to the public by posting information regarding the waiver request on our Web site at http://www.iowa.gov/educate/index.php?option=com_content&view=article&id=1978&Itemid=2642.

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Finally, on February 16, the IDE discussed this waiver request with its Superintendents Advisory Council, a group of LEA superintendents who geographically represent their constituents and one chief administrator of an AEA (Iowa's intermediate education agencies). The Council was unanimously highly favorable to the waiver request, one of the members noting that research shows that in schools where student achievement is beginning to improve, change in school leadership is actually counterproductive.

In summary, it is the request of the IDE that USED grant IDE a waiver, limited as described above, from the requirement that a persistently lowest-achieving school that implements either the turnaround or transformation model release its principal, and that the approval of such waiver to IDE not result in the deduction of any points from Iowa's RTTT application.

Yours truly,

Judy A. Jeffrey
Director

Encls.

APPENDIX A

The Iowa Department of Education will require documentation of effective actions taken by the principal/district in each of the following areas:

- 1) Specific actions of the LEA to support the existing principal
 - a. What is the LEA doing now
 - b. How will the LEA use SIG funds to expand its support of the existing principal
- 2) Specific efforts of the existing principal to improve student achievement
 - a. Leading and/or participating in professional development for teachers in specific instructional strategies
 - b. Directing data analysis by teachers that identifies specific instructional strengths and weaknesses
 - c. Student achievement data review by classroom teachers to direct student instruction
 - d. Any other actions pertinent to improving student achievement
- 3) Specific actions by the existing principal to improve instruction.
 - a. Recruitment of Highly Qualified Teachers (how many hired and how HQTs are identified)
 - b. Retention of Highly Qualified Teachers (how many retained and how HQTs are identified)
 - c. Documentation through teacher evaluation that provides sufficient evidence to document retention of highly effective teachers and transfer of less effective teachers
 - d. Coaching or supporting teachers by providing direct input into lesson planning and development focusing on specific student achievement goals
 - e. Organizational changes to provide more effective learning environments for students
 - f. Principal is engaged in professional development opportunities that increase skills in instructional leadership
 - g. Any other actions pertinent to improving instruction
- 4) Specific actions by the existing principal to supplement or restructure school services
 - a. Increase parent involvement within the building (i.e. parents part of the building leadership team, parent education program, parent volunteers, etc.)
 - b. Development of pre-school programs with focus on student achievement
 - c. Development of before/after school programs with direct ties to student achievement goals
 - d. Development of mentoring and/or business partnerships to increase student achievement
 - e. Development of health services that support student achievement
- 5) Specific actions by the existing principal and district that document and support principal effectiveness
 - a. Principal has been assigned to the building for no more than six years
 - b. Evaluation documents that demonstrate the effectiveness of principal with evidence of improved student achievement
 - c. District support for school changes is evident through resource allocation
 - d. District support is evident for teacher growth opportunities, teacher transfer, or termination
 - e. Any other actions pertinent to district support for the persistently low achieving school.
- 6) Specific demonstration of confidence in the existing principal by school staff and parents of students enrolled in the school
 - a. Specific actions by the principal to involve parents in their students' education
 - b. Feedback from parents/guardians that demonstrates confidence in the principal, and why
 - c. Evaluation or other documents that demonstrate teacher confidence in the principal, and why
 - d. Evaluation or other documents that demonstrate other staff confidence in the principal, and why

APPENDIX B

[Full pamphlet on Iowa Leadership Partnership is attached]

Iowa's cohesive school leadership system. Through the Iowa Leadership Partnership, funded by the Wallace Foundation, our state is about to complete a 10-year, multimillion-dollar initiative to strengthen cohesive school leadership. Iowa's goals have been to make school leadership a high priority, put policies and practices in place to ensure that principals and superintendents are *instructional leaders*. Beginning two years ago, the Wallace Foundation funded the RAND Corporation to conduct research in several Wallace-funded states and districts. RAND's report, released in December 2009, cited Iowa as one of only three states that has made exemplary progress toward a cohesive leadership system.

Targeted investments have yielded results. Through the work of the Leadership Partnership, there has been a steady progression of actions, policies, collaborations and action research to create a cohesive leadership system (CLS), as the following results suggest.

1. Leader standards and criteria

Iowa began by overhauling standards for principals and superintendents that would serve as the foundation for their recruitment, training and evaluation. Standards defining six skills and behaviors needed by effective instructional leaders as well as 35 supporting criteria that provide examples of what the standards look like in everyday practice were adopted by the state board of education in 2007, and are available electronically in Division III of chapter 83 rules at <http://www.legis.state.ia.us/aspx/ACODocs/DOCS/1-27-2010.281.83.pdf>.

2. Training for school leaders

Using best practice criteria as embedded in the Iowa Professional Development model and the National Staff Development Council's Professional Development Standards, multiple task forces and steering committees were assembled to design and deliver quality learning opportunities for leaders in every facet of the continuum of service to Iowa's students. All of the trainings listed in the attached pamphlet are new as of this decade.

3. Conditions for school leaders

Even the most talented and best-trained principals will fail if their working conditions do not support their improvement efforts. Several steps (as outlined more fully in the attached pamphlet) have been taken to create optimum working conditions, including creation of 45 School Administration Manager (SAM) teams that demonstrate how principals can increase student achievement when they are given time from managerial tasks to focus on instructional leadership.

Ensuring that every leader is an instructional leader requires a new set of strategic investments. The Iowa School Leadership Standards and Criteria set a high bar of expectations for all of Iowa's leaders. The IDE is fully committed to continuing to "push the envelope" to make these standards come alive in the day-today work of school administrators and those that evaluate them.